

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

ELLEN SMOAK

Plaintiff,

v.

**BIOHEALTH RX, LLC, EDWARD COKE
MANN III, and EDWARD COKE MANN
IV**

Defendants.

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CIVIL ACTION NO. 3:25-cv-919

JURY DEMANDED

**DEFENDANTS' UNOPPOSED MOTION FOR LEAVE
TO PROCEED WITHOUT LOCAL COUNSEL**

COME NOW, Defendants BioHealth, RX, LLC, Edward Coke Mann III and Edward Coke Mann IV ("Defendants") and file their unopposed motion for leave to proceed without local counsel, subject to and without waiving their defenses under Rule 12(b) of the Federal Rules of Civil Procedure, and in support would respectfully show:

1. This case involves allegations of breach of a contract, promissory estoppel, fraudulent inducement, sexual harassment and retaliation, intentional infliction of emotional distress, tortious interference with business relations, trade secret misappropriation, and alter ego & piercing the corporate veil.

2. Defendants have selected S. Craig Wilcox of the law firm Adams and Reese LLP to defend them in this lawsuit. Mr. Wilcox has been a licensed lawyer for 28 years, regularly handles commercial litigation cases, and is board certified in labor and employment law.

3. Mr. Wilcox is admitted to practice before this Court and is familiar with the local rules of this Court.

4. Although Adams and Reese, LLP does not maintain an office in the Northern District of Texas, Mr. Wilcox represents that either he or another member of his firm who is admitted to practice before this Court, can generally be physically present, as necessary, for in-person hearings before this Court, on relatively short notice, as little as one-day.

5. Pursuant to Local Rule 83.10, Defendants respectfully move for leave to proceed without local counsel. Under the circumstances, Defendants respectfully contend that the retention of local counsel under Local Rule 83.10 would be burdensome and inefficient.

WHEREFORE, Defendants respectfully request that this Court grant leave for Defendants to proceed without local counsel.

Respectfully submitted,

ADAMS AND REESE LLP

By: /s/ S. Craig Wilcox
S. CRAIG WILCOX
Texas Bar No.: 00797665
Federal Bar No.: 21177
craig.wilcox@arlaw.com
LyondellBasell Tower
1221 McKinney Street, Suite 4400
Houston, Texas 77010
Telephone: (713) 652-5151
Facsimile: (713) 652-5152

***ATTORNEY FOR DEFENDANTS BIOHEALTH
RX, LLC, EDWARD COKE MANN III AND
COKE MANN IV***

CERTIFICATE OF CONFERENCE

I hereby certify that I have conferred with Plaintiff's counsel about the relief sought in this motion and on April 30, 2025, Kaitlyn Coker responded by email that Plaintiff is unopposed.

/s/ S. Craig Wilcox
S. CRAIG WILCOX

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record in accordance with the Federal Rules of Civil Procedure, on this 2nd day of May 2025.

/s/ S. Craig Wilcox
S. CRAIG WILCOX